

Organization	Comment	Plan Section	DNR Repsonse
Michigan Wild Turkey Hunters Assoc	There is not one state forest compartment that we have reviewed that contains even the minimum habitat requirements for the various game species, both avian and animal. This includes many non game species as well. The revised plan does not acknowledge this. Eco-system management? Where? We understand that forest certification includes wildlife management. If we challenge the certification process would it stand the scrutiny?		Although not described in the SFMP, a wildlife biologist looks at each compartment to determine if wildlife values are being considered during the planning of forest management. Components of the SFMP include quality habitat for wildlife and environmentally sensitive species (page 19). Standards for sustainable forestry include the conservation of biodiversity and promoting the conservation of terrestrial and aquatic fauna and flora (page 20).
None	Does the Michigan State Forest Management Plan include provisions for hunting and fishing within the plan in addition to other interests such as hiking, wildlife watching, snowmobiling, etc.? Specifically, it is my understanding that the Michigan State Forest Management Plan calls for a concerted effort to maintain certain prairie ecosystems within your district that would inferentially benefit such species of birds such as the sharptailed grouse.	4	Hunting and fishing (pages 113, 114, 124) and recreation (page 110) are articulated as specific management directions within the SFMP. Open land habitat is listed as a specific consideration in the SFMP management direction (page 142). Objectives for habitat that support grassland species such as the Sharp-tailed grouse are addressed in the section 4.1.2.3 of the plan. In addition to the SFMP there are other planning processes that are related to hunting and fishing values (Wildlife Action Plan, State Comprehensive Outdoor Recreation Plan, 08-12 Off-Road Vehicle Plan, etc), which are referenced in the SFMP as standards.
None	I would like to strongly encourage you to continue and even increase habitat improvement by Aspen clear-cutting wherever it is feasible.	4	One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
None	I support management planning that increases early successional forest acreage and promotes aspen/birch type habitat increases through clear cutting and other methods. Also, the plan does a nice job laying out alternatives to reducing the boom/bust cycles in the Aspen acreage. I fully support some logging in the 30 39 age class as a method to accelerate the process of leveling the age classes. I also support the establishment of similar plans in the other commercially viable timber types. Oak is noticeably unbalanced and seems to have a significant acreage.	4	Support acknowledged. One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120). One of the tools the DNR will be using to help balance the aspen age class distributions is early harvests of the 30-40 year age class . Commercial demand for such stands will be a major factor in such harvests. As noted in this comment, the SFMP encourages a balanced age class distribution for oak (page 139).

None	I would like to add my support to the management plan that supports increasing early successional forest acreage and promotes aspen/birch type habitat increases through clearcutting and other prescription treatments.	4	Support acknowledged. One of the directions of the SFMP is to minimize the loss of the aspen coertype (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
Huron Pines RC&D	The close link between forest management and wildlife habitat was made in the plan, although we do think more emphasis should be placed on this concept. In particular, it would be beneficial to list more objectives pertaining to habitat improvement, along with expressing the benefits various practices for specific species. Mention of working in coordination with private landowners to help achieve state goals should also be a priority. Along those same lines, at least some of the public's misunderstanding of forest management practices, which is a continuing if not growing problem, can be minimized by making a stronger connection between forest management practices and wildlife benefits. Finally, we would encourage the Department to make greater use of the many conservation partners that are available to help.		Although not described in the SFMP, wildlife Division biologists are continually evaluating the relationship between proposed forest management activities and wildlife habitat. These relationships are openly discussed at public compartment review meetings. Habitat improvement objectives are very operational and the SFMP is more of a strategic document. These objectives will be noted in the Regional State Forest Plans that will be completed later this year. The relationship between private landowners and other partners regarding wildlife habitat will be important aspects of the Eco-regional management plans to be completed in the near future.
Ruffed Grouse Society	We support the consideration of achieving a more balanced age class of aspen age class in the state forests as noted on page 42 of the Plan but feel there are additional issues to consider other than only addressing the "boom or bust" wildlife "problem". Maintaining a variety of ages of aspen habitats are important across the Michigan landscape to wildlife populations but also for continuing a consistent supply of aspen fiber to markets.	4.1.2.2	Support acknowledged. One of the directions of the SFMP is to minimize the loss of the aspen coertype (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
Ruffed Grouse Society	The Society remains concerned with the continuing decline in aspen forest communities nationwide, regionally and in the Michigan. the state may be the only landowner that can maintain a significant aspen component. With a 31,000 acre decrease in aspen acreage projected for the Hiawatha and Ottawa National Forest Plans over the next 10 years, the Michigan State Forests will play an important role in addressing the continuing decline in aspen forest communities and the needs of wildlife associated with these communities, including several species of greatest conservation need in the State.	4	One of the directions of the SFMP is to minimize the loss of the aspen coertype (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).

Ruffed Grouse Society	The Society is quite disappointed with the inference (page 34) that a negative effect of continued aspen management is deer herbivory. While deer are having a significant effect on forest regeneration in Michigan, the amount of aspen in Michigan should not be blamed for this problem. In fact, aspen levels are currently at the lowest levels they have been in over 70 years, yet the deer population is at an all time high. Obviously other factors, like climate change, baiting, and deer population goals, are having a greater effect than aspen on Michigan's deer herd.	3.1.2	The point is not large acreages of aspen causing high herbivory by deer, but large harvests of aspen (which is what is required for "maintaining high acreage of aspen into the future") leading to larger acreages of young aspen. There are other factors which also influence deer populations, including those identified in the comment. In some Michigan areas, deer have a significant effect on forest regeneration and consequently the health of future forest stands. The statement has been slightly revised.
Ruffed Grouse Society	Michigan is extremely important for migrating bird populations. Many of its State Forests provide key stopover sites for migratory birds including the American woodcock. Stop-over habitat allows migrating species to rapidly refuel their depleted fat reserves and is essential for the development of comprehensive conservation strategies and management plans for migratory birds. We see little mention of this important habitat component for migrating birds in the revised Plan.	5	Waterfowl areas are addressed in Section 5.1.5 of the SFMP. Large areas of the State forest are intensively managed for the Kirtland's Warbler, which is a migratory species that is addressed in Section 5.2.5 of the SFMP. Many dedicated wildlife areas are also managed for the benefit of wildlife species (including migratory species), some of which are addressed in Section 5.2.6 of the SFMP. The SFMP direction to minimize the loss of the aspen cover type (page 124) and the move towards an even-aged class distribution for aspen (page 119) should assist in providing migration stopover cover for woodcock. The Wildlife Action Plan also notes the woodcock as a Species in Greatest Conservation Need related to needed management and preservation of lowland brush (alder).
None	I am very concerned when I read that aspen will not be managed as much as in past years. Is the American Woodcock next to disappear? Or maybe the Ruffed Grouse? It is widely known that they require aspen and alder cut in various age classes. Have we learned nothing from the New England states that neglected to manage their forests for the past 50 years? They are beginning to reverse that trend. Let's not follow the same path in Michigan. After crusing my land in Lake County, one of the MDNR service foresters from northern MI told me: "planting berry shrubs / trees will help, but the meat and potatoes stuff is clear cutting your old aspen and leaving stands of red, white and pin oak with the white pine and cedar mixed in." It appears the MDNR like the Ntl. Forest Service want us private landowners to "do as we say, not as we do." (We will tell you how to manage your land, but we will not be managing the state or federal lands).	4.1.2.2	One of the directions of the SFMP is to minimize the loss of the aspen coverytype (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120). Alder is not currently extensively managed, but local management is reviewed on an as needed basis by local wildlife biologists. These local areas are addressed through compartment review as need requires and based on habitat objectives. Also, the State Forest must be managed for a wider range of values which is different from more focused management that is possible on private lands.

Summary of Public Comments and DNR Responses to Draft Michigan SFMP  
Wildlife and Habitat Comments

05/27/2008

None	The State needs to aggressively manage its forest for sustainable habitat. What this means to me is the increased harvest of all trees with additional focus on the harvesting of the States aspen stands. Successional harvesting of our aspen forests is critical to this states wildlife with particular importance to Ruffed Grouse, The American Woodcock, and White-tailed Deer. Please do all that you can to insure that our aspen stands are harvested in a manner that supports a healthy forest. Aspen is maturing beyond prime at an alarming rate.	4	One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
None	As a citizen and hunter of the state of Michigan who utilizes state lands primarily for grouse and woodcock hunting, I'd like to urge the DNR to consider increasing the aspen harvest in an effort to help improve the habitat for grouse and woodcock as well as the many other declining early succession wildlife.	4	One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
None	I will keep it short, lets clear cut all the Aspen we can. Good habitat for Grouse, Woodcock and Deer. The State gets some money. Win Win.	4	One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124). Other directions articulated in the plan are to move towards an even age-class distribution for aspen (page 119) and to have multiple age-classes in close proximity (page 120).
Keen Forestry	The DNR need to reduce the number of deer on state land further because of the damage on state land I'm seeing to the regeneration especially in Northern hardwood stands. The stands are converting to beech stands and any desirable species that are being regenerated are browsed to the point at will effect the future quality of that tree. If QDMA were implemented across the state with more liberal doe harvests it would improve the chances for the targeted species to properly regenerate.	4	The SFMP raises the issue of deer herbivory in Section 3.2.1 and as General Objective 4 in section 4.1.2.2. Deer regulations are set annually through a separate process which is not appropriate to include in the SFMP.

None	I support the draft Plan's Management Objectives for early-successional cover types; specifically the objective of precluding older aspen stands from conversion to other cover types (yes, I am a grouse hunter!). Managing and preserving our aspen resources provides a too-seldom-available opportunity to accomplish a number of laudable goals: Increase in number and diversity of upland species, both birds and mammals; Generate revenue via pulpwood production; Preserve and generate employment in the paper and timber industries. While I appreciate the difficult task of trying to please diverse interests with respect to forest management, it would seem that active management of aspen and similar cover types allow a great opportunity to meet the management desires of hunters, birders, hikers, and the forest products industry. I would also encourage continued support of hunting as a recreational activity on state forest lands, and a mix of both roaded and roadless areas within the state forest system.	4	Support acknowledged. One of the directions of the SFMP is to minimize the loss of the aspen covertime (page 124).
Great Lakes Council, Federation of Fly Fishers and Anglers of the AuSable	We have the following comments and concerns regarding Section 4.1.61, and Metallic and Nonmetallic Mineral Development, pages 137-139. We would urge the inclusion of the Natural Rivers Act and rules a Standard for this plan. In Michigan, our highest quality rivers and streams and their tributaries are protected by the Natural Rivers Act and the Blue Ribbon Trout Stream Program. We propose that a Standard encompassing all of the waters protected by this act and program include a 1250 foot buffer that is classified as "Non-Leasable" or "Leasable with no surface development" for oil and gas development.	4.1.6.1 and 5.2.3	The intent of the Natural Rivers Act is reflected in the plans and zoning adopted for rivers so designated under that statute. The purpose of the SFMP is to implement existing rules and policy not to impose new standards. The suggestion of a 1250 foot zone for restriction of oil and gas leases is not appropriate to this plan.

Anglers of the AuSable	We urge you to include specific language in the Plan to provide a standard requiring that all lands within 1,320 feet of Natural Rivers, their tributaries, or waters classified as "Blue Ribbon Trout Streams" be classified as "Non-Leasable" or Leasable With No Surface Development. Such a requirement is perfectly consistent with current Natural Resources Commission policy which "prohibits drilling for gas or oil within ¼ mile of any major stream. This prohibition is repeated in the Au Sable Natural Rivers Plan at Section IV. M. That requirement is also consistent with the Gas and Oil Operations Rules at Rules R324.201 (2) (iv) (A) and R324.201 (2) (iv) (D). These Rules require a permit applicant to state, among many other requirements, what surface waters and other environmentally sensitive areas and Natural Rivers are within 1,320 feet of a proposed well.	4.1.6.1 and 5.2.3	Despite the language in the AuSable Natural River Plan, there is no NRC policy that "prohibits drilling for gas or oil within ¼ mile of any major stream". That language is not NRC policy but dates back to 1970 oil and gas lease language. The intent of the Natural Rivers Act is reflected in the plans and zoning adopted for rivers so designated under that statute. The intent of the NRC is reflected in the approved terms and conditions in state oil and gas leases. Oil and gas regulations 324.201 2 provide a requirement to identify lakes and streams (and other environmental features) within 1320 feet in the drilling application. This is intended for review purposes, there is no restriction or implied setback in this rule. The suggestion of a 1250 foot zone for restriction of oil and gas leases is not appropriate to this plan. The purpose of the SFMP is to implement existing rules and policy not to impose new standards.
Michigan Association of Timbermen	In many areas of the state one can not conduct a small clear-cut of aspen for fear that the deer will not allow the aspen to repopulate the site. Aspen regeneration is typically prolific but can not grow quick enough to escape browsing. If you incorporate the elk herd in Northern Lower Michigan then the smallest size of clear-cut is not less than 40 acres. I like to refer to deer as lawn mowers and elk as the brush hogs. Aspen is a vital forest type for the timber industry and also various wildlife species. In fact, many aspen cuts on the state forest are conducted to provide good winter feeding habitat of the cervidae species. The continued browsing on aspen sprouts allows other less desirable tree species to become established or in worse case scenarios no tree species come back.	4	Section 3.2.1 Forest Health Conditions and Trends was modified to specifically identify the issue of cervid herbivory. Section 4.1.2.3, Objective 14 addresses the issue of cervid populations and forest biodiversity, regeneration, composition and sustainability. Section 4.1.2.2, General Objective 4 addressed assessment of the severity and effect of cervid herbivory on forest regeneration.
Michigan Association of Timbermen	One aspect that has allowed an overabundance of animals is the legalization of baiting in Michigan. Baiting does not allow nature to run its course by naturally culling the herd. Severe winters are not having as large of an impact when the deer herd is supplemented by baiting. Banning the use of bait would all reverse this and allow nature to run its course. When a wildlife population exceeds the habitats carrying capacity this creates an atmosphere for negative impacts to not only the natural resources but to the herd and association animal species.		The establishment of baiting regulations is under the purview of the Natural Resource Commission, and is beyond the scope of the Michigan State Forest Management Plan.

	4.1.1.4 p.114. This sentence's title includes hunting, trapping, fishing, etc., but yet the objectives are all related to fish and not the other activities. Sec. 4.1.1.5 discusses hunting.	4.1.1.4	Section 4.1.1.4 also addresses dispersed hunting, while Section 4.1.1.5 addresses more focused areas (such as floodings) that are managed specifically for hunting.
	4.1.4.1 Objective 1, p.131. We need to be careful when identifying or dedicating lands with rare, T & E, and species of concern because often this results in making it easier for collectors to know where to go for specimens. Often additional traffic on sensitive sites creates problems in protecting these resources.	4.1.4.1	Concern acknowledged.
	4.1.2 Biodiversity. P.117. I feel that desired future condition needs to look forward to changes in biodiversity due to factors such as climate change, etc. and perhaps somewhat less emphasis on what was/is.	4.1.2.1	The biodiversity desired future condition incorporates the terms "conserves, restores, and protects native biodiversity" and "healthy and sustainable." A reference to what was or is must be made to address what could and should be with respect to a biodiversity desired future condition. It does not state "restore to circa 1800 conditions" but rather mentions a resilience to disturbances and provision of ecological and socio-economic values.
	4.1.2. Objective 8, p.117. This objective concerns me, I'm not an advocate for trying to establish more mesic conifer into some forest types if their presence would encourage larger deer populations in those areas. I suspect Objective 8 could have a negative impact on Objectives 7 in some cases.	4.1.2.1	The mesic conifer restoration flows from objective 7. It is intended to expand the mesic conifer for those mixed mesic conifer-deciduous communities where the mesic component has been greatly reduced. The intent is to lessen deer impacts in some areas by dispersing the herd over more of the landscape